

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THE CHEROKEE NATION,)	
THE CHICKASAW NATION, and)	
THE CHOCTAW NATION,)	
)	
Plaintiffs,)	
)	
THE CITIZEN POTAWATOMI NATION,)	
THE MUSCOGEE (CREEK) NATION,)	No. CIV-19-1198-D
THE QUAPAW NATION,)	
THE DELAWARE NATION,)	
THE SEMINOLE NATION, and)	
THE WICHITA AND AFFILIATED TRIBES,)	
)	
Plaintiffs-in-Intervention,)	
)	
v.)	
)	
J. KEVIN STITT, in his official capacity as)	
the Governor of the State of Oklahoma,)	
)	
Defendant/Counterclaimant.)	
)	

**PLAINTIFFS' AND PLAINTIFFS-IN-INTERVENTION'S CHEROKEE NATION,
CHICKASAW NATION, CHOCTAW NATION, CITIZEN POTAWATOMI
NATION, DELAWARE NATION, MUSCOGEE (CREEK) NATION, QUAPAW
NATION, AND SEMINOLE NATION MOTION FOR PARTIAL SUMMARY
JUDGMENT**

Pursuant to Fed. R. Civ. P. 56(a) and (c), L.Civ.R. 7.1, and this Court's Order of April 23, 2020, ECF No. 122, Plaintiffs and Plaintiffs-in-Intervention Cherokee Nation, Chickasaw Nation, Choctaw Nation, Citizen Potawatomi Nation, Delaware Nation, Muscogee (Creek) Nation, Quapaw Nation, and Seminole Nation ("Nations") respectfully submit this Motion for Partial Summary Judgment on the issue of whether the Nations' Compacts automatically renewed on January 1, 2020 under the terms of Part

15.B. of the Compacts. For the reasons described in the supporting brief and statement of undisputed material facts, the Court should rule that the Compacts automatically renewed and grant the Nations' requests for declaratory relief. *See* Complaint at 21, ECF No. 1; Complaint in Intervention at 17-18, ECF No. 29; Complaint at 4-5, ECF No. 30; Complaint in Intervention at 7-8, ECF No. 62; Complaint in Intervention at 7-8, ECF No. 68; Complaint in Intervention at 5, ECF No. 74.

Respectfully submitted,

Dated: May 22, 2020

By: s/ Robert H. Henry
Robert H. Henry, OBA No. 4111
512 N. Broadway, Suite 230
Oklahoma City, OK 73102
Lead Counsel for the Cherokee,
Chickasaw and Choctaw Nations
Phone no.: 405-516-7824
Fax no.: 405-516-7859
E-mail: rh@rhenrylaw.com

Frank S. Holleman, *pro hac vice*
Douglas B. L. Endreson
Sonosky, Chambers, Sachse,
Endreson & Perry, LLP
1425 K. Street, NW Suite 600
Washington DC 20005
Counsel for the Cherokee, Chickasaw
and Choctaw Nations
Phone no.: 202-682-0240
Fax no.: 202-682-0249
E-mail: fholleman@sonosky.com
dendreson@sonosky.com

Additional Counsel on Following Page

Sara Hill, OBA No. 20072
P.O. Box 1533
Tahlequah, OK 74465
Counsel for Cherokee Nation
Phone no.: 918-207-3836
Fax no.: 918-458-6142
E-mail: sara-hill@cherokee.org

Stephen Greetham, OBA No. 21510
4001 N. Lincoln Blvd
Oklahoma City, OK 73105
Counsel for Chickasaw Nation
Phone no. 580-272-5236
E-mail: stephen.greetham@chickasaw.net

Bradley Mallett, OBA No. 15810
P.O. Box 1210
Durant, OK 74702
Counsel for Choctaw Nation
Phone no.: 580-380-3024
E-mail: bmallett@choctawnation.com

Gregory M. Quinlan, NM Bar # 4450
Colo. Bar # 21605
George J Wright, OBA # 21873
1601 S Cooper Dr
Shawnee, OK 74801
Counsel for Citizen Potawatomi Nation
Phone no. 405-275-3121
Email: george.wright@potawatomi.org

Leslie D. Taylor, OBA No. 19469
P.O. Box 2206
Ada, OK 74821
Counsel for Delaware Nation
Phone no.: 580-279-0068
Fax no.: 580-279-0070
E-mail: leslietaylorlaw@gmail.com

Additional Counsel on Following Page

Roger F Wiley, OBA No. 11568
Kyle B. Haskins, OBA No. 12694
PO Box 580
Okmulgee, OK 74447
Counsel for Muscogee (Creek) Nation
Phone no.: 918-295-9720
Fax no.: 918-756-2445
Email: rwiley@mcnag.com
khaskins@mcnag.com

Stephen R. Ward, OBA No. 13610
R. Daniel Carter, OBA No. 30514
C. Austin Birnie, OBA No. 31942
Conner & Winters, LLP
4000 One Williams Center
Tulsa, OK 74172-0148
Counsel for Quapaw Nation
Phone no.: 918-586-8605
Fax no.: 918-586-8605
E-mail: sward@cwlaw.com
dcarter@cwlaw.com
abirnie@cwlaw.com

Stuart D. Campbell, OBA No. 11246
Doerner, Saunders, Daniel & Anderson,
LLP
700 Williams Center Tower II
Two West Second Street
Tulsa, OK 74103-3117
Counsel for Seminole Nation
Phone no.: 918-591-5242
Fax no.: 918-925-5242
E-mail: scampbell@dsda.com

Robert Rosette
Rosette, LLP
565 W. Chandler Blvd., Suite 212
Chandler, AZ 85225
Counsel for Seminole Nation
Phone no.: 480-889-8990
Fax no.: 480-889-8891
E-mail: rosette@rosettelaw.com

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2020, I electronically filed the above and foregoing document with the Clerk of Court via the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the parties registered to receive such notice.

s/ Frank S. Holleman
Frank S. Holleman